

UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF GEORGIA  
AUGUSTA DIVISION  
NO. CR 120-102

UNITED STATES OF AMERICA )

v. )

TELLY SAVALAS CARSWELL )

**MOTION FOR DISCLOSURE OF ALL  
EXCULPATORY EVIDENCE**

NOW COMES the Defendant, TELLY SAVALAS CARSWELL (“CARSWELL”), pursuant to Fed. R. Crim. Proc. 16 and the principles of Brady v. Maryland, 373 U.S. 83 (1963), and its progeny, and asks this Honorable Court to enter an Order directing that counsel for the Government make inquiry forthwith and disclose, or permit CARSWELL to inspect and copy, information that is either within the possession, custody, or control of the Government, or the existence of which is known through the exercise of due diligence could become known to the Government that may be materially favorable to CARSWELL, either directly, indirectly or in an impeaching manner, within the purview of Brady, Giglio and their progeny.

This Motion for the Disclosure of Exculpatory Evidence is continuing in nature.

Respectfully submitted, this the 8th day of December, 2020.

**/s/ J. Pete Theodocion**

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J. Pete Theodocion  
Attorney for Defendant

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(706) 722-3000

**CERTIFICATE OF SERVICE**

I hereby certify that on December 8, 2020, I electronically filed the foregoing **MOTION FOR DISCLOSURE OF ALL EXCULPATORY EVIDENCE** with the Clerk of the Court using the CM/ECF system which will send notification to all interested parties.

**/s/ J. Pete Theodocion**

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